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Attorneys for Defendant  
ANASTASSIA KREZOUN

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**  
**SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANASTASSIA KREZOUN

Defendant.

Case No. 8:23-cr-00042-CJC

**DEFENDANT'S UNOPPOSED EX  
PARTE APPLICATION TO SEAL  
DEFENDANT'S PARTIAL  
OPPOSITION TO REPLACING,  
SEALING, OR REDACTING THE  
COURT'S SENTENCING  
MEMORANDUM**

Defendant Anastassia Krezoub through her counsel of record Deputy Federal Public Defender Terra D. Castillo Laughton, hereby applies to the Court for an Order that Defendant's Partial Opposition to Replacing, Sealing, or Redacting the Court's Sentencing Memorandum be filed under seal. This Ex Parte Application is based on the attached memorandum of points and authorities and Declaration of Terra D. Castillo Laughton.

Respectfully submitted,

CUAUHTEMOC ORTEGA  
Federal Public Defender

DATED: May 23, 2024

By /s/ Terra D. Castillo Laughton

TERRA D. CASTILLO LAUGHTON  
Deputy Federal Public Defender

**MEMORANDUM OF POINTS AND AUTHORITIES**

A court has supervisory powers over its records and files to seal documents under appropriate circumstances, *United States v. Mann*, 829 F.2d 849, 853 (9th Cir. 1987). Accordingly, Local Rule 79-5.1 permits a party to apply for an order to seal documents.

Following Ms. Krezoub's sentencing, counsel for the government and counsel for the victim have filed requests to modify, redact, or seal the Court's sentencing memorandum. These filings were made under seal. Because Ms. Krezoub's partial opposition to the government's and the victim's requests will reference those sealed filings, Ms. Krezoub is seeking to seal her opposition as well, at least until the Court rules on the underlying issues regarding what portion, if any, of the Court's sentencing memorandum should be removed or made non-public.

Therefore, Ms. Krezoub respectfully requests that the Court grant this ex parte application to seal.

**DECLARATION OF TERRA D. CASTILLO LAUGHTON**

I, Terra D. Castillo Laughton, hereby state and declare as follows:

1. I am a Deputy Federal Public Defender in the Central District of California appointed to represent Anastassia Krezoub in the above-entitled action.

2. Ms. Krezoub was sentenced on May 20, 2024 to time served. Judgment was entered the same day. ECF No. 73.

3. On May 22, 2024, counsel for the victim filed a Motion for Amended Sentencing Memorandum That Protects His Privacy and Dignity Pursuant to the Crime Victims' Rights Act, 18 U.S.C. § 3771. This filing was made under seal.

4. Also on May 22, 2024, government filed a Request to Seal and Redact the Court's Sentencing Memorandum. This filing was made under seal. *See* ECF No. 75.

5. Ms. Krezoub's Partial Opposition to Replacing, Sealing, or Redacting the Court's Sentencing Memorandum cites the victim's and government's sealed filings listed above. Ms. Krezoub therefore requests that the Court permit her to file her partial opposition under seal, at least until the Court rules on the underlying issues regarding what portion, if any, of the Court's sentencing memorandum should be removed or made non-public.

6. On May 23, 2024, Assistant United States Attorney Andrew Roach informed me that the government does not object to this request.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: May 23, 2024

/s/ Terra D. Castillo Laughton  
TERRA D. CASTILLO LAUGHTON  
Deputy Federal Public Defender

**PROOF OF SERVICE**

I declare that I am a resident or employed in Orange County, California; that my business address is the Office of the Federal Public Defender, 411 West Fourth Street, Suite 7110, Santa Ana, California 92701-4598, Telephone No. (714) 338-4500; that I am over the age of eighteen years; that I am not a party to the action entitled above; that I am employed by the Federal Public Defender for the Central District of California, who is a member of the Bar of the State of California, and at whose direction I served a copy of the attached **DEFENDANT'S UNOPPOSED EX PARTE APPLICATION TO SEAL DEFENDANT'S PARTIAL OPPOSITION TO REPLACING SEALING OR REDACTING THE COURT'S SENTENCING MEMORANDUM**

on the following individual(s) by:

☐ Placing same in a sealed envelope for collection and interoffice delivery addressed as follows:

☐ Placing same in an envelope for hand delivery addressed as follows:

☐ Placing same in a sealed envelope for collection and mailing via the United States Post Office addressed as follows:

☒ Via email addressed as follows:

**Douglas Axel & Anna Tutundjian**  
**Sidley Austin LLP**  
**daxel@sidley.com**  
**atutundiian@sidlev.com**

This proof of service is executed at Santa Ana, California, on May 23, 2024.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

/s/ Erica Bustos  
**Erica Bustos**